

### Remarks

Claims 1-145 are pending. Claims 1-145 are rejected. Applicants respectfully traverse the rejection and request allowance of claims 1-145.

Claims 1-145 stand rejected under 35 U.S.C. § 102(e) over U.S. Patent 6,493,447 (Goss et al.).

Independent claims 1, 14, and 27 require receiving a call request message for a web call, identifying a web call center resource in response to receiving the call request message, and generating and transmitting a routing instruction to route the web call to the web call center resource. Independent claims 40, 61, and 81 require receiving a call request message for a web call, determining whether any web call center resource is available to handle the web call in response to receiving the call request message, and transferring a web call indicator to a web call queue in response to the determination that all web call center resources are unavailable. Independent claims 101, 116, and 131 require receiving a call request message for a web call, identifying the web service application for the web call in response to the call request message, and generating and transmitting an instruction to provide the web service application to the web call. The present application defines a web call as “an Internet session for exchanging information using call treatment or videoconferencing treatment” (see page 3, lines 12-14). The present application defines a web call center as including a web call server and a web call center resource/web call center agent (see page 5, lines 2-4). Advantageously, the claims may be implemented in some embodiments to handle an incoming web call.

Goss does not disclose receiving a web call and does not disclose an Internet session for exchanging information using call treatment or videoconferencing treatment. Instead, Goss receives a customer contact in an HTML page (see col. 1, line 66 to col. 2, line 2).

Goss does not disclose identifying a web call center resource in response to receiving the call request message and generating and transmitting a routing instruction to route the web call to the web call center resource. Goss does not even disclose a web call center including a web call server and a web call center resource/web call center agent. In contrast, Goss discloses a contact server that enables customers to submit HTML call-

back requests to a call center via the Internet (see col. 1, lines 62-64). The contact server of Goss merely serves as a repository for HTML call-back requests. Goss therefore discloses a web interaction to request a call-back (see col. 1, line 62 to col. 2, line 13). The call-back request is read by a human call center operator, who in response generates a conventional telephone call-back over the Public Switched Telephone Network (PSTN) (see col. 3, lines 51-66). The call-back comprises an operator-initiated voice telephone call to the call-back requester. The call-back is initiated by the human call center operator and occurs at a later time and subsequent to the call-back request. Therefore, a call-back has no relation to the web call disclosed in the present application.

Goss does not connect a web call to a web call center resource. Moreover, Goss does not generate a routing instruction for connecting a web call to a web call center resource, or even for routing a web call in general. An HTML page does not require a routing instruction, as an HTML page comprises packet data that includes embedded addressing that enables routing.

Goss does not determine whether any web call center resource is available to handle the web call in response to receiving the call request message. Consequently, Goss does not transfer a web call indicator to a web call queue in response to the determination that all web call center resources are unavailable. The cited text at col. 5, lines 40-45 and col. 7, lines 1-5 of Goss does not disclose determining whether any web call center resource is available. The cited text merely describes tracking of a busy status of a *human* agent or operator in a conventional telephone call center. Likewise, cited text in Goss at col. 1, lines 19-22, etc., does not describe transferring a web call indicator to a web call queue. The cited text of Goss merely describe a prior art conventional telephone voice call queue.

Goss does not identify a web service application for the web call in response to the call request message. Consequently, Goss does not generate and transmit an instruction to provide the web service application to the web call. The cited text at col. 4, lines 37-48, etc., does not disclose identifying a web service application for the web call. Instead, Goss discloses a user being able to select and access a data source.

Independent claims 1, 14, 27, 40, 61, 81, 101, 116, and 131 therefore include features that are neither taught nor suggested by Goss. Claims 2-13, 15-26, 28-39, 41-60,

62-80, 82-100, 102-115, 117-130, and 132-145 are allowable for the same reasons as claims 1, 14, 27, 40, 61, 81, 101, 116, and 131.

Applicants submit that there are numerous additional reasons in support of patentability, but that such reasons are moot in light of the above remarks and are omitted in the interests of brevity. Applicants respectfully request allowance of claims 1-145.

Please feel free to call me to discuss the patentability of the pending claims.

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